

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

CASE NO. 4:19-CV-00957

**CLASS PLAINTIFFS' UNOPPOSED MOTION TO SEAL:
(1) THEIR OPPOSITIONS TO DEFENDANTS' DAUBERT MOTIONS;
(2) THEIR OPPOSITIONS TO DEFENDANTS' SUMMARY JUDGMENT
MOTIONS; AND (3) THEIR MOTION TO STRIKE THE KPMG MEMO**

Class Plaintiffs in the above-captioned action respectfully request leave to file under seal unredacted copies of their oppositions to Defendants' sealed motions to exclude certain expert opinions, their oppositions to Defendants' sealed motions for summary judgment and their related motion to strike, and all exhibits in support thereof (Dkt. Nos. 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 569, 570, 571, 572, 573, 582 and 584, collectively, herein Class Plaintiffs' "January Confidential Filings"). Defendants do not oppose the relief sought by this motion.

As grounds for this motion, Class Plaintiffs state as follows:

1. On August 17, 2021, the Court entered the Stipulation and Protective Order ("PO"), which governs the handling of confidential information exchanged in discovery in this matter.
2. According to Paragraph 24 of the PO, "[i]f any party submits Confidential

Discovery Material or Confidential Attorney Eyes Only Discovery Material to the Court, the submission must be filed only under seal on CM/ECF if filed electronically[.]” PO at ¶24 (emphasis added).

3. Class Plaintiffs’ January Confidential Filings contain, describe and refer to non-public documents and information that has been designated by the parties and nonparties as Confidential Discovery Material pursuant to the PO.

4. On January 18, 2024 and January 19, 2024, Class Plaintiff’s filed their January Confidential Filings under seal. Class Plaintiffs will file public, redacted versions of the Expert Motion Papers no later than February 18, 2024. In the interim, Class Plaintiffs’ will confer with the parties and non-party witnesses whose Confidential information is contained in Class Plaintiffs’ January filings, to determine which portions must remain under seal.

5. Class Plaintiffs are bound by the provisions of the agreed-upon Protective Order that this Court ordered on August 17, 2021, and therefore must seek leave to file their January Confidential Filings under seal.

6. The defendants against whose motions Class Plaintiffs’ January Confidential Filings are directed do not oppose this motion.

THEREFORE, Class Plaintiffs request that the Court grant their request for leave to file under seal unredacted copies of their January Confidential Filings.

Dated: January 20, 2024

Respectfully submitted,

/s/ Andrew J. Entwistle

Andrew J. Entwistle (attorney-in-charge)
State Bar No. 24038131
Callie Crispin
State Bar No. 24104231
Sal H. Lee (*pro hac vice*)

ENTWISTLE & CAPPUCCI LLP

500 West 2nd Street, Suite 1900
Austin, TX 78701
Telephone: (512) 710-5960
Facsimile: (212) 894-7278

-and-

Joshua K. Porter (*pro hac vice*)
Brendan J. Brodeur (*pro hac vice*)
Andrew M. Sher (*pro hac vice*)
ENTWISTLE & CAPPUCCI LLP
230 Park Avenue, 3rd Floor
New York, NY 10169
Telephone: (212) 894-7200
Facsimile: (212) 894-7278

Court-Appointed Co-Lead Counsel

Carol C. Villegas (*pro hac vice*
forthcoming)
David Saldamando (*pro hac vice*)
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

*Counsel for Plaintiff Camelot Event
Driven Fund, A Series of Frank Funds
Trust*

/s/ Trig Smith

Trig Smith (*pro hac vice*)
Lonnie Browne (*pro hac vice*)
John Kelley (*pro hac vice*)

**ROBBINS GELLER RUDMAN &
DOWD LLP**

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: (619) 231-1058
Facsimile: (619) 231-7423

Court-Appointed Co-Lead Counsel

CERTIFICATE OF CONFERAL

I certify that on January 3, 2024 and January 19, 2024, counsel for Class Plaintiffs conferred by telephone and videoconference (respectively) with counsel for those defendants against whose motions Class Plaintiffs' January Confidential Filings are directed, and defense counsel stated that his clients do not oppose the relief sought herein.

/s/ Andrew J. Entwistle
Andrew J. Entwistle